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**UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

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**Greg Eugene Latza,**

**Plaintiff,**

**v.**

**Snap Finance LLC and Matthew  
Ryan Hawkins,**

**Defendants.**

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT (INJUNCTIVE  
RELIEF DEMANDED)**

Civil No. 2:21-cv-00658-JCB

Magistrate Judge Jared C. Bennett

**JURY DEMANDED**

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**COMPLAINT FOR COPYRIGHT INFRINGEMENT  
(INJUNCTIVE RELIEF DEMANDED)**

Plaintiff GREG EUGENE LATZA by and through his undersigned counsel,  
brings this Complaint against Defendants SNAP FINANCE, LLC and MATTHEW  
RYAN HAWKINS for damages and injunctive relief, and in support thereof states  
as follows:

### **SUMMARY OF THE ACTION**

1. Plaintiff GREG EUGENE LATZA (“Latza”) brings this action for violations of exclusive rights under the Copyright Act, 17 U.S.C. § 106, to copy and distribute Latza's original copyrighted Work of authorship.

2. Latza is based in South Dakota and shoots a wide range of photographs around America. Latza’s photos consist mostly of agricultural, natural, and land-based photographs capturing the true essence of nature.

3. Defendant SNAP FINANCE LLC (“Snap”) is a lease-to-own finance company that lends customers money to purchase products like furniture, wheels & tires, mattresses, electronics, appliances, car audio, jewelry and mobile phones. At all times relevant herein, Snap owned and operated the internet website located at the URL [www.snapfinance.com](http://www.snapfinance.com) (the “Website”).

4. Defendant MATTHEW RYAN HAWKINS (“Hawkins”) is upon information and belief the owner of Snap and the registrant of the Website.

5. Defendants Snap and Hawkins are referred to collectively herein as “Defendants.”

6. Latza alleges that Defendants copied Latza's copyrighted Work from the internet in order to advertise, market and promote its business activities. Defendants committed the violations alleged in connection with Defendants’

business for purposes of advertising and promoting sales to the public in the course and scope of the Defendants' business.

### **JURISDICTION AND VENUE**

7. This is an action arising under the Copyright Act, 17 U.S.C. § 501.

8. This Court has subject matter jurisdiction over these claims pursuant to 28 U.S.C. §§ 1331, 1338(a).

9. Defendants are subject to personal jurisdiction in Utah.

10. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c) and 1400(a) because the events giving rise to the claims occurred in this district, Defendants engaged in infringement in this district, Defendants reside in this district, and Defendants are subject to personal jurisdiction in this district.

### **DEFENDANTS**

11. Snap Finance LLC is a Utah limited liability company with its principal place of business at 1275 W. 2240 S., West Valley City, Utah 84119 and can be served by serving its registered agent, Corporation Service Company at 15 West South Temple Street, Suite 600, Salt Lake City, Utah 84101.

12. Matthew Ryan Hawkins is an individual residing in Tooele county, state of Utah and can be served at 7720 Boulder Drive, Lake Point, Utah 84074.

**THE COPYRIGHTED WORK AT ISSUE**

13. In 2012, Latza created the photograph entitled 20120515\_tscfourth\_037, which is shown below and referred to herein as the “Work”.



14. Latza registered the Work with the Register of Copyrights on March 4, 2020 and was assigned the registration number VA 2-193-804. The Certificate of Registration is attached hereto as Exhibit 1.

15. Latza's Work is protected by copyright but is not otherwise confidential, proprietary, or trade secrets.

16. At all relevant times Latza was the owner of the copyrighted Work at issue in this case.

### **INFRINGEMENT BY DEFENDANTS**

17. Defendants have never been licensed to use the Work at issue in this action for any purpose.

18. On a date after the Work at issue in this action was created, but prior to the filing of this action, Defendants copied the Work.

19. On or about October 20, 2020, Latza discovered the unauthorized use of his Work on the Website.

20. Defendants copied Latza's copyrighted Work without Latza's permission.

21. After Defendants copied the Work, they made further copies and distributed the Work on the internet to promote the sale of their lease-to-own finance services.

22. Defendants copied and distributed Latza's copyrighted Work in connection with Defendants' business for purposes of advertising and promoting Defendants' business, and in the course and scope of advertising and selling products and services.

23. Latza's Works are protected by copyright but are not otherwise confidential, proprietary, or trade secrets.

24. Defendants committed copyright infringement of the Work as evidenced by the documents attached hereto as Exhibit 2.

25. Latza never gave Defendants permission or authority to copy, distribute or display the Work at issue in this case.

26. Latza notified Defendants of the allegations set forth herein on October 23, 2020. To date, the parties have failed to resolve this matter. A copy of the Notice to Defendants is attached hereto as Exhibit 3.

### **COUNT I COPYRIGHT INFRINGEMENT**

27. Latza incorporates the allegations of paragraphs 1 through 26 of this Complaint as if fully set forth herein.

28. Latza owns a valid copyright in the Work at issue in this case.

29. Latza registered the Work at issue in this case with the Register of Copyrights pursuant to 17 U.S.C. § 411(a).

30. Defendants copied, displayed, and distributed the Work at issue in this case and made derivatives of the Work without Latza's authorization in violation of 17 U.S.C. § 501.

31. Defendants performed the acts alleged in the course and scope of its business activities.

32. Defendants' acts were willful.

33. Latza has been damaged.

34. The harm caused to Latza has been irreparable.

WHEREFORE, the Plaintiff Greg Eugene Latza prays for judgment against Defendants Snap Finance LLC and Matthew Ryan Hawkins that:

a. Defendants and their officers, agents, servants, employees, affiliated entities, and all of those in active concert with them, be preliminarily and permanently enjoined from committing the acts alleged herein in violation of 17 U.S.C. § 501;

b. Defendants be required to pay Plaintiff his actual damages and Defendants' profits attributable to the infringement, or, at Plaintiff's election, statutory damages, as provided in 17 U.S.C. § 504;

c. Plaintiff be awarded his attorneys' fees and costs of suit under the applicable statutes sued upon;

d. Plaintiff be awarded pre and post-judgment interest; and

e. Plaintiff be awarded such other and further relief as the Court deems just and proper.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury of all issues so triable.

DATED: November 5, 2021

Respectfully submitted,

*/s/ Frank Compagni*

FRANK COMPAGNI

*Attorneys for Plaintiff*